

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LONTEX CORPORATION

Plaintiff,

v.

NIKE, INC.,

Defendant.

Civil Action No. 2:18-cv-05623-MMB

Hon. Michael M. Baylson

**PLAINTIFF'S UPDATE RE: ATTORNEYS' FEES AND COSTS**

Pursuant to the Court's Order Re: Post-Trial Motions, "Plaintiff shall submit an updated request for attorneys' fees for post-trial work not included in Plaintiff's previous submission within fourteen (14) days. Defendant shall have seven (7) days to respond." (ECF 392.)

Plaintiff submitted its updated request for attorneys' fees for post-trial work with its reply briefing (ECF 389 at 10; *see also* 390 at 2). Plaintiff has no additional fees for post-trial work to include with this submission. For completeness, Plaintiff also notes that it previously submitted its requests for awards of taxable and non-taxable costs.

In total, Plaintiff requests \$4,625,711.504 in attorney's fees and \$631,951.36 in non-taxable costs (ECF 389 at 10), and \$80,190.93 in taxable costs (ECF 379 at 1). Pursuant to the Court's prior orders (ECF 366, ¶ 5), Plaintiff disclosed to Nike underlying data for attorney's fees on November 4, 2021 (ECF 384-2, ¶ 19; ECF 384-9, Ex. 7), data for non-taxable costs on November 18, 2021 (ECF 384-13, Ex. 11 at p. 4 of 8), and data for updated attorney's fees on January 14, 2022 (ECF 390, ¶ 5).

For reference, Plaintiff provides the following chart of the parties' submissions regarding the pending motion and request for attorney's fees and costs:

ECF	Document	Date
378	Plaintiff's Bill of Costs	11/12/2021
378-1 to 378-8	Wagner Declaration In Support of Plaintiff's Bill of Costs with Exhibits A through F	11/12/2021
379	<u>Corrected</u> Plaintiff's Bill of Costs	11/12/2021
379-1 to 379-8	<u>Corrected</u> Wagner Declaration In support of Plaintiff's Bill of Costs with Exhibits A through F	11/12/2021
380	Notice of Errata Re: Plaintiff's Bill of Costs	11/15/2021
380-1	Exhibit E-2 to Plaintiff's Bill of Costs	11/15/2021
384-1	Plaintiff's Opening Briefing Re: Attorney's Fees, Costs, and Post-Judgment Interest, at pp. 16–25	11/24/2021
384-2 to 384-13	Wagner Declaration with Exhibits 1 through 11	11/24/2021
386	Defendant's Responsive Briefing Re: Attorney's Fees and Costs, at pp. 25–35	12/22/2021
389	Plaintiff's Reply Briefing Re: Attorney's Fees, Costs, and Post-Judgment Interest, at pp. 10–15	1/11/2022
390	Wagner Declaration re: updated post-trial fees	1/11/2022

Dated: March 4, 2022

TROUTMAN PEPPER HAMILTON  
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By: /s/ Ben L. Wagner

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LONTEX CORPORATION

**CERTIFICATE OF SERVICE**

I hereby certify that on March 4, 2022, a true and correct copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent via e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Ben L. Wagner

Ben L. Wagner